## REMARKS/ARGUMENTS

Claims 1, 2, 4-6, 9-20, 23-31, 33, 34 and 37-46 are pending in the present application. In the Office Action mailed June 30, 2006, the Examiner rejected claims 1, 2, 4-31, 33-46 under 35 U.S.C. § 103. Claims 1, 2, 4-31, 33-46 have been cancelled. New claims 47-75 have been added.

### A. New Claims 47-75

Applicants respectfully submit that new claims 47-75 are patentably distinct from the cited references. Claim 47 recites "a plurality of individual software components that are to be loaded into volatile memory" and "a plurality of individual software components that are not to be loaded into volatile memory." Claim 47 also recites "a loading table that is directly configurable by a user to control which of the individual software components are loaded into volatile memory and which of the individual software components are not loaded into volatile memory." Support for these amendments may be found throughout Applicants' Specification, such as on page 6, lines 22-23.

Claims 47, 57, and 67 recite "examin[ing] [a] loading table to determine which of the individual software components are to be loaded into volatile memory and which of the individual software components are not to be loaded into volatile memory," "selectively load[ing] each of the individual software components that are to be loaded, as indicated in the loading table, into the volatile memory," and "not load[ing] the individual software components that are not to be loaded into the volatile memory as indicated in the loading table, wherein the individual software components that are not to be loaded are not loaded into volatile memory until the loading table is reconfigured to indicate that the individual software components are to be loaded into volatile memory." Support for these amendments may be found throughout Applicants' Specification, such as on page 6, line 28 through page 7, line 3 and page 7, line 20-23.

Applicants submit that new claims 47, 57, and 67 are patentably distinct from the cited references. Specifically, Applicants submit that none of the cited references disclose, teach, or suggest "the individual software components that are not to be loaded are not loaded into volatile

memory until the loading table is reconfigured to indicate that the individual software components are to be loaded into volatile memory," as recited in claims 47, 57, and 67.

The Office Action asserts that Deo discloses "a plurality of individual software components." Office Action, page 3. In support of this assertion, the Office Action quoted the following portion of Deo and included his parenthetical comments:

> A first portion (comprising individual software components) of the variables and the event handler for the software application are loaded (using a loader application) from a storage memory (i.e. non-volatile memory) that is not used for execution of the application, into a RAM of the system...

See id. at page 4 and Deo, col. 2, lines 53-55. Apparently, the Examiner is equating "a first portion of the variables" with "individual software components." However, Deo further discloses that "[i]n response to either a change in the state of the system or a new event, another software component is loaded into the RAM for execution by the processor, replacing at least one of the software components previously loaded." Id. at lines 59-63. Therefore, based on a change in the state of the system or a new event, Deo "replac[es] at least one of the software components previously loaded." Furthermore, Deo discloses that "[t]hese steps repeat until execution of the software application is terminated." Id. at lines 63-64.

Applicants respectfully submit that because Deo merely repeatedly "replac[es] at least one of the software components previously loaded," Deo does not disclose, teach, or suggest that "the individual software components that are not to be loaded are not loaded into volatile memory until the loading table is reconfigured to indicate that the individual software components are to be loaded into volatile memory," as recited in claims 47, 57, and 67. Rather, Deo merely discloses "replacing at least one of the software components previously loaded" "[i]n response to either a change in the state of the system or a new event." Nothing in this portion discloses that "the loading table is reconfigured" prior to "replacing at least one of the software components [that were] previously loaded." Furthermore, Applicants cannot find any other portion of Deo that discloses, teaches, or suggests "the individual software components that are not to be loaded are not loaded into volatile memory until the loading table is reconfigured to indicate that the individual software components

are to be loaded into volatile memory," as recited in claims 47, 57, and 67. Therefore Deo does not disclose this claim limitation, as recited in claims 47, 57, and 67.

Applicants respectfully submit that Aguilar, Parry, and Buxton do not disclose, teach, or suggest that "the individual software components that are not to be loaded are not loaded into volatile memory until the loading table is reconfigured to indicate that the individual software components are to be loaded into volatile memory," as recited in claims 47, 57, and 67. Consequently, Applicants respectfully submit that claims 47, 57, and 67 are patentably distinct from the cited references. Accordingly, Applicants respectfully request that these claims be allowed.

Claims 48-56 depend either directly or indirectly from claim 47. Claims 58-66 depend either directly or indirectly from claim 57. Claims 68-75 depend either directly or indirectly from claim 67. Accordingly, Applicants respectfully request that claims 48-56, 58-66, and 68-75 be allowed for at least the same reasons as those presented above in connection with claims 47, 57, and 67.

Furthermore claims 56, 66, and 75 recite "examin[ing] a hardware configuration by a loader application" and "modify[ing] the loading table based on the hardware configuration." Applicants respectfully submit that none of the cited references disclose these limitations.

The Office Action asserts that Deo discloses "examining hardware configuration by the loader application and modifying the loading table based on the hardware configuration." Office Action, page 10. In support of this assertion, the Office Action quotes the following portion of Deo:

> By executing an applet, the basic functionality of Nomad (or any other small portable device in which the present invention is embodied) can be substantially altered and thus expanded. Accordingly, the useful life of the device is extended by providing appropriate applets to enhance its functional capabilities. For example, if embodied in a cell phone that when originally sold, did not include the ability to provide caller identification (ID), an appropriate applet executed by a processor in the cell phone could provide that additional caller ID functionality.

Deo, col. 13, lines 55-65. Apparently the Office Action is asserting that "providing appropriate applets to enhance [any small portable device's] functional capabilities" is the same as "modify[ing] the loading table based on the hardware configuration," as recited in claims 56, 66, and 75.
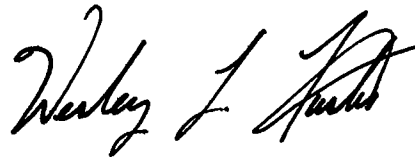
Applicants respectfully submit, however, that nothing in this quoted portion of Deo discloses, teaches, or suggests any type of modification to a loading table. Rather, this portion of Deo merely discloses that the small portable devices disclosed in Deo may be functionally enhanced.

Additionally, Applicants respectfully submit that nothing in this quoted portion of Deo discloses, teaches, or suggests "examin[ing] a hardware configuration by a loader application," as recited in claims 56, 66, and 75. First, nothing in this portion discloses, teaches, or suggests any action by a "loader application," as recited in claims 56, 66, and 75. Second, nothing in this portion discloses, teaches, or suggests any kind of "examin[ation]," as recited in claims 56, 66, and 75. Furthermore, Applicants cannot find any other portion of Deo that discloses, teaches, or suggests "examin[ing] a hardware configuration by a loader application" and "modify[ing] the loading table based on the hardware configuration," as recited in claims 56, 66, and 75. Therefore, Applicants respectfully submit that Deo does not disclose, teach, or suggest either of these limitations, as recited in claims 56, 66, and 75. Furthermore, Applicants respectfully submit that the Office Action has not cited, nor can Applicants find, any portion of Aguilar, Parry, and/or Buxton that discloses, teaches, or suggests these limitations.

C.  Conclusion

Applicants respectfully assert that all pending claims are patentably distinct from the cited references, and request that a timely Notice of Allowance be issued in this case. If there are any remaining issues preventing allowance of the pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Respectfully submitted,

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